

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

**BEVERLY B. MARTIN, as next friend
of KHALID MOUTON,**

Plaintiff,

vs.

AHMED HOLT, et al.,

Defendants.

**CIVIL ACTION NO.
5:23-cv-00004-MTT-CHW**

DEFENDANTS MOTION TO DISMISS

Defendants Ahmed Holt, Robert Toole, Stan Shepard, Jack Sauls, Sharon Lewis, Trevonza Bobbitt, Michael Anderson, Josh Wicker, Deidra Edwards, Juanita Sharpe, Chad Putnam, Joseph Hall, Shayla McClain, Barnard Florence, Cierra Harper, Jessica Howard, Carl Anderson, Marjorie Glover, Cory Osborne, Heather Flowers, Angela Howell, and Kenneth Scott, by and through counsel, the Attorney General for the State of Georgia, file this Motion to Dismiss Plaintiff's Complaint. The basis for this motion is set forth in more detail in the accompanying brief in support.

Respectfully submitted this 13th day of March, 2023.

CHRISTOPHER M. CARR 112505
Attorney General

W. WRIGHT BANKS, JR. 036156
Deputy Attorney General

Please Serve:
Ellen Cusimano
Georgia Department of Law
40 Capitol Square, S.W.
Atlanta, GA 30334-1300
Telephone: (404) 458-3597
Facsimile: (404) 651-5304
ecusimano@law.ga.gov

ROGER A. CHALMERS 118720
Senior Asst. Attorney General

BRIAN E. GOLDBERG 417635
Assistant Attorney General

/s/ Ellen Cusimano
ELLEN CUSIMANO 844964
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

This 13th day of March, 2023.

/s/ Ellen Cusimano

ELLEN CUSIMANO 844964
Assistant Attorney General